

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

JIMMERINE MILES,

Case No. 19-41272-MAR

Chapter 13

Debtor.

Hon. Mark A. Randon

**RESPONSE BY THE STATE OF MICHIGAN DEPARTMENT OF
TREASURY TO DEBTOR'S OBJECTION TO ITS CLAIM**

The Michigan, Department of Treasury (Treasury), through its attorneys, Dana Nessel, Attorney General, and Moe Freedman, Assistant Attorney General, responds as follows.

1. Treasury filed a proof of claim in this case for unpaid State of Michigan income tax, and unpaid City of Detroit income tax.
2. The Claim included estimated amounts for the City of Detroit taxes for 2016, 2017, and 2018, as well as State of Michigan income taxes for 2017 and 2018.
3. Debtor filed an objection to this claim, stating that the debtor did not have a requirement to file a 2016 City of Detroit tax returns because of insufficient income, and that the debtor had filed an affidavit with the bankruptcy court to that effect.

4. The City of Detroit maintains that the debtor is required to file a tax return for 2016.

5. The Debtor additionally claimed in the objection that all the other returns have been forwarded to the State of Michigan.


6. Treasury had not received the returns directly and the Attorney General's office only received some of the returns via email after this objection has been filed, and has still not received the City of Detroit return for 2018.

7. Treasury will process the returns it has received and amend the claims accordingly but is still seeking City of Detroit tax returns for 2016 and 2018.

Based on the above, the Michigan Department of Treasury respectfully requests that the Debtors' objection to Treasury's claims be denied.

Respectfully submitted,

Dana Nessel
Attorney General


/s/ Moe Freedman
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